

CLEARY GIACOBBE ALFIERI JACOBS, LLC

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Attorneys for Defendants, Neptune City Police, Michael Volbrecht and Edward Kirschenbaum

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

JACQUELYN REAVES

Plaintiff,

v.

MONMOUTH UNIVERSITY, JOANNE
JODRY, GEORGE KAPALKA, GREY
DIMMENA, NINA ANDERSON,
CHARLENE DIANA, MARY ANNE NAGY,
FRANCA MANCINI, NEPTUNE CITY
POLICE, KEITH MITCHELL, MICHAEL
VOLBRECHT, EDWARD
KIRSCHENBAUM, MONMOUTH
UNIVERSITY POLICE, JEFF LAYTON,
WILLIAM MCELRATH, MONMOUTH
MEDICAL CENTER, DALE RAFINELLO,
ANTHONY TRACHTA, AMINA
CHOWDHURY, MATTHEW GELLER,
VIRGINIA KINNEMAN, JACKLYN
SANTIAGO, TRENTON PSYCHIATRIC
HOSPITAL, PATRICK ERVILUS, ROBERT
WOOD JOHNSON UNIVERSITY,
HOSPITAL, JAMES MCCALLUM, ROBERT
CAVELLA, KATIE OZOLINS,

Defendants.

CIVIL ACTION

Docket No. 3:22-cv-01782-PGS-RLS

**APPLICATION FOR EXTENSION
OF TIME TO ANSWER, MOVE
OR OTHERWISE REPLY
PURSUANT TO LOCAL RULE 6.1(B)**

Application is hereby made pursuant to Local Civil Rule 6.1(b) for a Clerk's Order extending time within which Defendants, Neptune City Police, Michael Volbrecht and Edward Kirschenbaum ("Neptune Defendants"), may Answer, Move or Otherwise Reply to the Amended

Complaint filed by Plaintiff and entered on the docket on April 6, 2022, for an additional fourteen (14) days, and in support of such application it is represented that:

1. No previous extensions have been obtained to respond to Plaintiff's Complaint;
2. Receipt of Plaintiff's Complaint by counsel for the Neptune Defendants was via email on April 27, 2022;
3. Defendants' time to Answer, Move or Otherwise Reply therefore expires on Wednesday, May 11, 2022, and as such this application for a Clerk's Order for an extension herein is timely.

CLEARY GIACOBBE ALFIERI JACOBS, LLC

Attorneys for Defendants, Neptune City Police,
Michael Volbrecht and Edward Kirschenbaum,

By: s/ Jodi S. Howlett
Jodi S. Howlett, Esq.

Dated: May 10, 2022